

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ANDRE WILLIAMS,  
a/k/a "Jenna,"  
a/k/a "Cutman,"

Defendant.

**SUPERSEDING INDICTMENT**

S1 23 Cr. 25 (VB)

**COUNT ONE**  
**(Narcotics Conspiracy)**

The Grand Jury charges:

1. From in or about April 2022 up to and including in or about November 2022, in the Southern District of New York and elsewhere, ANDRE WILLIAMS, a/k/a "Jenna," a/k/a "Cutman," the defendant, and others known and unknown, intentionally and knowingly did combine, conspire, confederate, and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and an object of the conspiracy that ANDRE WILLIAMS, a/k/a "Jenna," a/k/a "Cutman," the defendant, and others known and unknown, would and did distribute and possess with the intent to distribute controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

3. The controlled substances that ANDRE WILLIAMS, a/k/a "Jenna," a/k/a "Cutman," the defendant, conspired to distribute and possess with the intent to distribute were mixtures and substances containing a detectable amount of cocaine base, cocaine, heroin, and fentanyl, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Section 846.)

**COUNT TWO**  
**(Possession with Intent to Distribute Narcotics)**

The Grand Jury further charges:

4. On or about November 22, 2022, in the Southern District of New York and elsewhere, ANDRE WILLIAMS, a/k/a “Jenna,” a/k/a “Cutman,” the defendant, intentionally and knowingly possessed with the intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

5. The controlled substance involved in the offense was a mixture and substance containing a detectable amount of cocaine, in violation of Title 21, United States Code, Section 841(b)(1)(C).

(Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).)

**COUNT THREE**  
**(Possession of a Firearm**  
**During and In Relation to a Drug Trafficking Crime)**

The Grand Jury further charges:

6. On or about November 22, 2022, in the Southern District of New York and elsewhere, ANDRE WILLIAMS, a/k/a “Jenna,” a/k/a “Cutman,” the defendant, during and in relation to a drug trafficking crime for which he may be prosecuted in a court of the United States, namely, the narcotics conspiracy charged in Count One of this Indictment and the possession with intent to distribute narcotics as charged in Count Two of this Indictment, knowingly did use and carry a firearm, and, in furtherance of such crime, did possess a firearm, to wit, a Smith & Wesson M&P Bodyguard 380, and did aid and abet the use, carrying and possession of a firearm.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

**COUNT FOUR**  
**(Felon in Possession of a Firearm)**

The Grand Jury further charges:

7. On or about November 22, 2022, in the Southern District of New York and elsewhere, ANDRE WILLIAMS, a/k/a “Jenna,” a/k/a “Cutman,” the defendant, knowing he had previously been convicted in a court of a crime punishable by imprisonment for a term exceeding one year, knowingly did possess a firearm, to wit, a Smith & Wesson M&P Bodyguard 380, which firearm had previously had been shipped and transported in interstate and foreign commerce.

(Title 18, United States Code, Section 922(g)(1).)

**FORFEITURE ALLEGATION**

8. As a result of committing the offense alleged in Counts One and Two of this Indictment, ANDRE WILLIAMS, a/k/a “Jenna,” a/k/a “Cutman,” the defendant, shall forfeit to the United States, pursuant to Title 21, United States Code, Section 853, any and all property constituting, or derived from, any proceeds obtained, directly or indirectly, as a result of said offenses and any and all property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of, said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

**SUBSTITUTE ASSET PROVISION**

9. If any of the above-described forfeitable property, as a result of any act or omission of ANDRE WILLIAMS, a/k/a “Jenna,” a/k/a “Cutman,” the defendant:

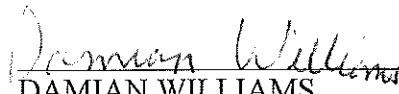
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendant up to the value of the forfeitable property described above.

(Title 21, United States Code, Section 853.)

  
FOREPERSON

  
DAMIAN WILLIAMS  
United States Attorney